

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

AARON SIEGEL;)
)
JASON COOK;)
)
JOSEPH DELUCA;)
)
NICOLE CUOZZO;)
)
TIMOTHY VARGA;) Civil Action No. 1:22-cv-07463-
) KMW-AMD
)
CHRISTOPHER STAMOS;)
)
KIM HENRY; and) **CIVIL ACTION**
)
ASSOCIATION OF NEW JERSEY)
RIFLE & PISTOL CLUBS, INC.,)
)
Plaintiffs,)
)
v.)
)
MATTHEW PLATKIN, in his official)
capacity as Attorney General of New)
Jersey,)
)
PATRICK J. CALLAHAN, in his)
official capacity as Superintendent of the)
New Jersey Division of State Police,)
)
Defendants.

**DECLARATION OF NICOLE CUOZZO IN SUPPORT OF
PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

1. I, Nicole Cuozzo, am a plaintiff in the above-titled action. I am over the age of 18, have personal knowledge of the facts and events referred to in this Declaration, and am competent to testify to the matters stated below.

2. I am a law-abiding resident and citizen of the United States and the State of New Jersey. I reside at 98 Lakewood Rd. New Egypt, New Jersey 08533. I am a member of Association of New Jersey Rifle & Pistol Clubs, Inc.

3. I am a member of the Bible Baptist Church in New Egypt, New Jersey.

4. I am a firearm owner because I believe that possession and carry of firearms is an important aspect of protecting my family and my church from the risk of violent crime.

5. I am applying for my Handgun Carry Permit because I recognize that violent crime can take place anywhere, including when I am outside the home, and including at the church. I am currently in the process of completing my shooting range qualification for my Handgun Carry Permit. Once completed, I will satisfy all of the requirements for a Handgun Carry Permit.

6. I am aware of numerous mass shooting incidents which took place at houses of worship around the United States, including the First Baptist Church in Sutherland Springs, Texas, the Emanuel African Methodist Episcopal Church in Charleston, South Carolina, and the Tree of Life Synagogue in Pittsburgh, Pennsylvania.

7. In particular, however, I am aware of the Freeway Church of Christ in Texas where, in 2019, a volunteer parishioner armed with a concealed handgun successfully ended an attack by an active shooter within six seconds after it began.

8. I welcomed the *Bruen* decision because my church cannot afford full time professional security to protect the members of the church against the possibility of attack by an active shooter. The church conducts services and other events most days of the week in addition to Sundays, and holds special events for the church members and the community at large on holidays and other special days throughout the year.

9. I, as well as members of the clergy, the diaconate, and the congregation who either have or are applying and qualify for Handgun Carry Permits would carry their handguns to protect the people attending church; however, we refrain from doing so for fear of arrest and prosecution.

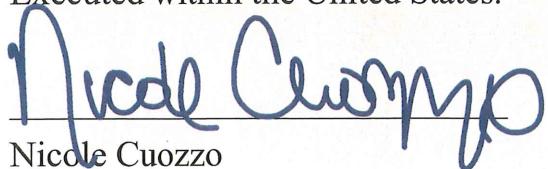
10. This is because in addition to services and other religious events, the church also conducts Sunday school classes, adult bible classes, and a homeschool Co-op in which parents who homeschool their children bring their children together at the church for certain joint events and learning programs.

11. However, once I have my permit, I will refrain from carrying my handgun at the church because of the prohibition on carry at a “school, college, university or other educational institution” set forth in A4769 section 7(a)(7)

because I am unsure if the Sunday school classes, adult bible classes, and homeschool COOP qualify as a “school, college, university or other educational institution” within the meaning of those sections because those terms are vague and A4769 does not define those terms.

12. I will refrain from carrying in any part of the church or church grounds because of the prohibition on carry at a “school, college, university or other educational institution” set forth in A4769 section 7(a)(7) because that prohibition includes any part of the buildings, grounds, or parking area. Therefore, I fear that the prohibition on carry at “school, college, university or other educational institution” also includes the entire church building and all of the church grounds, not merely those portions of the church property used for the classes and during class time.

I declare under penalty of perjury that the foregoing is true and correct. Executed within the United States.


Nicole Cuozzo

12/22/2022

Date